

UNITED STATES DISTRICT COURT  
IN THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**TERRY A. BAIER,** )  
Plaintiff, )  
 )  
 )  
v. )  
 )  
**ROHR-MONT MOTORS, INC.,** )  
an Illinois corporation d/b/a )  
Oakbrook Toyota in Westmont, )  
**JOHN BARRETT, ALEX SYED,** )  
Defendants. )

Case No. 12 CV 8234  
Judge Blakey

**DECLARATION OF ANNEMARIE E. KILL**

I, Annemarie E. Kill, pursuant to 28 U.S.C. § 1746, declare as follows:

1. This declaration is submitted in support of Plaintiff's Petition for Attorney's Fees for the period from October 12, 2012 through June 26, 2015 ("Fee Petition") for the specific hours and billing rates related to work performed in this litigation by me and by other time billers at the law firm of Avery Camerlingo Kill, LLC on behalf of the Plaintiff.

2. I am a 1995 graduate of DePaul University College of Law. I am a founder of the law firm Avery Camerlingo Kill, LLC. I am a member in good standing of the bar of the Supreme Court of Illinois and the United States District Court for the Northern District of Illinois. I am also a member of the Trial Bar of the Northern District of Illinois. I have practiced primarily employment law and also family law (concentrating on allocation of employee benefits in divorce cases) since 1995. Further information concerning my educational and professional background is contained in my Curriculum Vitae, attached as **Exhibit B** to the Fee Petition.

3. Rebecca E. Cahan is a 2005 graduate of New York Law School. Ms. Cahan is an associate attorney at Avery Camerlingo Kill, LLC. She is a member in good standing of the bars

of the Supreme Court of Illinois and the United States District Court for the Northern District of Illinois. Ms. Cahan's further qualifications are attached as **Exhibit E**.

4. In connection with the preparation of Plaintiff's Fee Petition, I have reviewed our firm's files in this case, including our time and billing records. The time records of Avery Camerlingo Kill, LLC for work on behalf of Plaintiff are attached as **Exhibit C** to the Fee Petition. They set forth a true and accurate record of the professional services actually and reasonably rendered by the attorneys, paralegals, and law clerks at Avery Camerlingo Kill, LLC who worked on this litigation and for whom fees are being sought. In addition, attached as **Exhibit D** is a summary of the total number of hours and rate of each biller.

5. Exhibit C is a record containing details concerning the hours expended and the type of services provided on behalf of Plaintiff in this case. These time records were compiled by generating a printout of the time spent on this litigation from Avery Camerlingo Kill, LLC's electronic time and billing program. Time is recorded accurately by each billing professional at Avery Camerlingo Kill, LLC by entering such into the time and billing program contemporaneously with the work performed. However, paralegal/clerk time records are entered by a person other than the paralegal/clerk.

6. Avery Camerlingo Kill, LLC requests the following rates: for Annemarie Kill a rate of \$350 - \$375 per hour for legal services for office time, and \$450 an hour for trial time; for Rebecca Cahan a rate of \$250-\$275 per hour; and for paralegals and clerks a rate of \$75 per hour. Those rates are based on the 2012 hourly rates and the subsequent increase of rates in April, 2015. The office rates are the rates that Avery Camerlingo Kill, LLC regularly charges for the services of the attorneys' paying clients in the normal course of its practice. The trial time is the rate appropriate for this case.

7. It is the custom and practice of attorneys at Avery Camerlingo Kill, LLC to bill fee-paying clients on a monthly basis at the above office time rates. A representative sample of other Fee Agreements are attached as **Exhibit F**.

8. I believe that the time for which fees are requested as well as the rates proposed in the Plaintiff's Fee Petition, totaling **\$362,927.50** for the period from October 12, 2012 through June 26, 2015, is reasonable and should be fully compensated. Based on my years of experience representing parties in employment litigation and in other matters, I am very familiar with the legal market in Chicago and the hourly rates customarily charged by attorneys. My knowledge is based on, among other things, review of billing and payment records of other law firms in other litigation. Additionally, the hourly rates of the paralegals and law clerks named above are comparable to or below those of similarly qualified and experienced paralegals and law clerks at such firms.

I state under penalty of perjury that the foregoing is true and correct.

Dated: July 7, 2015

/s/ Annemarie E. Kill  
Annemarie E. Kill